| DISTRICT OF COLUMBIA | |
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| IN THE MATTER OF THE APPLICATION OF WP COMPANY LLC d/b/a THE WASHINGTON POST FOR ACCESS TO CERTAIN SEALED COURT RECORDS | x : : : : : : : : : : : : : : : : : : : |
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THE WASHINGTON POST'S UNOPPOSED MOTION FOR AN EXTENSION IN WHICH TO FILE A REPLY IN FURTHER SUPPORT OF ITS MOTION FOR PUBLIC ACCESS TO CERTAIN SEALED COURT RECORDS

WP Company LLC d/b/a The Washington Post (the "Post"), by and through its undersigned counsel, files this unopposed motion for an extension of time—to and including April 26, 2019—to file a reply in further support of its motion pursuant to Local Criminal Rule 57.6 for an Order unsealing court records in *United States v. Paul J. Manafort, Jr.*, Criminal Action No. 17-0201-01 (ABJ) (the "Motion").

- 1. The Post filed the Motion on March 7, 2019. On March 20, 2019, the Court granted the Government's unopposed motion to extend its time to respond to the Motion to and including April 1, 2019.
- 2. On March 22, 2019, the Special Counsel notified the Attorney General that he had completed his investigation into Russian interference in the 2016 presidential election.
- 3. On March 28, 2019, the Court granted the Government's motion for an additional two-week extension of time to respond to the Motion over the Post's opposition.
- 4. On April 15, 2019, the Department of Justice announced that it expects to release a redacted version of the final report of the Office of Special Counsel (the "Mueller Report") on April 18, 2019.

5. The Post anticipates that the release of the Mueller Report could have an impact on the merits of the Motion, and the scope of information that can and should be unsealed in this case. Accordingly, the Post believes that a short extension to allow the parties time to sufficiently review the Mueller Report and assess how the information released therein will affect this case would help ultimately resolve this matter more efficiently.

6. On April 17, 2019, the Government informed the Post that it consents to this request.

For the foregoing reasons, the Post's unopposed motion for an extension of time to and including April 26, 2019 should be granted. A proposed order accompanies this motion.

Dated: April 17, 2019

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By: /s/ Laura R. Handman

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| UNITED STATES DISTRICT COURT DISTRICT OF COLUMBIA | | |
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| IN THE MATTER OF THE APPLICATION OF: WP COMPANY LLC d/b/a THE WASHINGTON POST FOR ACCESS TO CERTAIN SEALED COURT RECORDS: | Misc. Action No. 19-00032 (ABJ) [PROPOSED] ORDER | |
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| Upon consideration of the Motion for an Extension of Time to File a Reply in Further | | |
| Support of the Motion by WP Company LLC d/b/a The Washington Post (the "Post") for Public | | |
| Access to Certain Sealed Court Records, it is hereby | y | |
| ORDERED that the Post's motion is GRAN | NTED. | |
| Hon. Amy Berman Jackson U.S. District Judge | Date | |